

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA**

**Criminal No. 1:25-cr-130**

United States of America,

Plaintiff,

vs.

**Wendi Renae Wells,**

Defendant

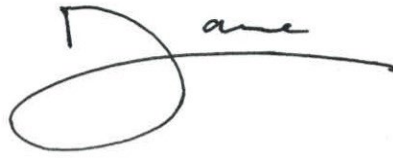
**REQUEST FOR NOTICE  
PURSUANT TO  
FED. R. EVID. 609(b)**

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Wendi Renae Wells, through her attorneys, Dane DeKrey and Bruce Ringstrom Jr., requests that the U.S. Attorney provide the undersigned with notice, pursuant to FED. R. EVID. 609(b), of any conviction or convictions with respect to which a period of more than 10 years has elapsed since the date of the conviction, which the United States intends to offer at trial for the purpose of attacking the credibility of Ms. Wells or any witness, sufficiently in advance of trial so Ms. Wells is afforded a fair opportunity to contest the use of the evidence. Ms. Wells requests that notice of any conviction or convictions subject to the requirements of FED. R. EVID. 609 be provided no later than the deadline set by the Court for the disclosure of discovery by the government or, if no order setting a deadline for the government's disclosure of discovery is entered, no later than 15 days before trial.

Date: September 18, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dane", with a large, stylized loop at the beginning and a horizontal line extending to the right.

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Dane DeKrey  
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